IN THE UNITED STATES DISTRICT COURT EASTERN DISTRICT OF ARKANSAS

| UNITED STATES OF AMERICA | } | |
|--------------------------|---|-----------------------|
| v | } | CASE NO. 4:19CR212 JM |
| KESHAWN BOYKINS | } | |

MOTION TO CONTINUE

Comes now, the Defendant, by and through his attorney, Brooks Wiggins, and for his Motion to Continue, states:

- Counsel was appointed to represent the Defendant on or about May 15,
 This matter is set for Jury Trial on January 21, 2020 at 9:00 a.m.
- 2. In the last few days, the United States Attorney has filed a Superseding Indictment against the Defendant with additional charges against him.
- 3. Counsel has not had adequate time to investigate the new charge against the Defendant and as such, is unable to proceed to trial without adequate time to investigate and prepare for trial.
- 4. The Assistant United States Attorney, Kristin Bryant, has no objection to a continuance of this matter.
- 5. Speedy trial time should be tolled against the Defendant.

WHEREFORE, the Defendant, through counsel, moves the Court to Continue this matter, and for all other relief in which he is entitled.

Respectfully Submitted,

Brooks Wiggins
Brooks Wiggins, #2003080
Attorney at Law
111 South Main Street

Benton, AR 72015 (501) 244-2244 (501) 421-6274 FAX brooks@jbwiggins.com